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March 18, 2025

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Spencer Lee Schneider v. Odyssey Study Group LLC, et al.*
Civil Docket No. 22-07686 (DG) (VMS)

Dear Judge Scanlon,

Defense counsel contacted the undersigned today regarding the letter Plaintiff Spencer Schneider filed on March 15, 2025 (ECF No. 88) in opposition to Defendants' motion to compel to discuss two matters, each of which is addressed below.

First, in the March 15, 2025 letter, Plaintiff inadvertently cited:

In re Veeco Instruments, Inc. Sec. Litig., No. 05 MD 01695(CM)(GAY), 2007 WL 724555, at *1 (finding that the burden of "identifying three confidential witnesses from a list of fifty-five persons identified on initial disclosures was not an 'unmanageable number' of persons and thus, did not present 'undue hardship[.]'").

While the parenthetical included in the letter describing the *Veeco* decision is correct, the specific citation connected to it is erroneous. The correct citation is:

United States ex rel. Integra Med Analytics, LLC v. Laufer, No. 17CIV9424CSJCM, 2023 WL 3203912, at *6 (S.D.N.Y. May 2, 2023) ("Cf. *In re Veeco Instruments, Inc. Sec. Litig.*, No. 05MD1695 (CM)(GAY), 2007 WL 274800, at *1 (S.D.N.Y. Jan. 29, 2007) (finding that identifying three confidential witnesses from a list of *fifty-five* persons identified on initial disclosures was not an 'unmanageable number' of persons and thus, did not present 'undue hardship')").

Second, Defense counsel advised that they took issue with Plaintiff's characterization that "With the exception of limited financial records, Defendants refuse to produce anything that does not contain Plaintiff's name." (ECF. No. 88 at 2). After meeting and conferring, Plaintiff is willing to stipulate that in addition to documents that directly pertain to Plaintiff, Defendants have provided limited corporate, property and other financial records, but we maintain that

Defendants have otherwise refused to provide documents responsive to Plaintiff's requests. As Defendants are aware, we intend to move to compel regarding these disputed requests.

Respectfully submitted,

/s/ Elizabeth Geddes

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